

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JOHN OLIVER EDWARDS)	
)	
Plaintiff)	
)	
vs.)	Case No.: C-1-01-582
)	
IOF FORESTERS SEVERANCE)	
PAY PLAN AND SUMMARY PLAN)	
DESCRIPTION FOR FIELD)	
DISTRICT MANAGEMENT)	
EMPLOYEES OF THE INDEPENDENT)	
ORDER OF FORESTERS)	
WHO WORK IN U.S. FIELD OFFICES)	
and)	
THE INDEPENDENT ORDER OF)	
FORESTERS)	
)	
Defendants)	

PLAINTIFF'S RESPONSE TO DEFENDANT'S
FIRST REQUEST FOR ADMISSIONS

1. Please admit that on or about April 17, 1996 Plaintiff submitted an application for life insurance to Penn Treaty Network Insurance Company on behalf of John Furlong.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

2. Please admit that on or about May 1, 1996 Plaintiff submitted an application for life insurance to Penn Treaty Network America Insurance Company on behalf of Donald A. Gardner.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the

needs of the IOF customers.

3. Please admit that on or about May 23, 1996 Plaintiff submitted an application for life insurance to Penn Treaty Network America Insurance Company on behalf of Margaret E. Bates.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

4. Please admit that on or about August 8, 1996 Plaintiff submitted an application for life insurance to Penn Treaty Network America Insurance Company on behalf of Naomi C. Barker.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

5. Please admit that on or about August 8, 1996 Plaintiff submitted an application for life insurance to Penn Treaty Network America Insurance Company on behalf of George J. Barker.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

6. Please admit that on or about October 8, 1996 Plaintiff submitted an application for life insurance to Penn Treaty Network America Insurance Company on behalf of Ida Lea Matheny.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

7. Please admit that on or about October 20, 1996 Plaintiff submitted an application for life insurance to Penn Treaty Network America Insurance Company on behalf of Dorothy E. Coffey.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

8. Please admit that on or about January 13, 1997 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Larry G. Brindenbaugh.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

9. Please admit that on or about February 12, 1997 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Angie F. Drake.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

10. Please admit that on or about October 21, 1996 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Patrick M. Conwell.

RESPONSE: The Plaintiff admits that an application was submitted with the full

knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

11. Please admit that on or about November 12, 1996 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Bonnie J. Beckelhymer.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

12. Please admit that on or about November 19, 1996 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of George L. Brackney.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

13. Please admit that on or about January 4, 1997 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Linda Richardson.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

14. Please admit that on or about January 4, 1997 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of David Sailing.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the

needs of the IOF customers.

15. Please admit that on or about January 17, 1997 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Joy F. Bridenbaugh.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

16. Please admit that on or about October 23, 1996 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of David W. Stroub.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

17. Please admit that on or about October 23, 1996 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Patti K. Stroub.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

18. Please admit that on or about September 12, 1996 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Raymond L. Hudak.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

19. Please admit that on or about October 28, 1996 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Louis Ross.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

20. Please admit that on or about May 20, 1996 Plaintiff submitted an application for life insurance to National Western Life Insurance Company on behalf of Yvonne F. Hagan.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

21. Please admit that on or about April 1, 1996 Plaintiff submitted an Agent/Agency Data Sheet to National Western Life Insurance Company for the purpose of becoming an agent of said organization to sell life insurance products.

RESPONSE: The Plaintiff admits that an application was submitted with the full knowledge acquiescence and approval of the regional managers of the IOF to accommodate the needs of the IOF customers.

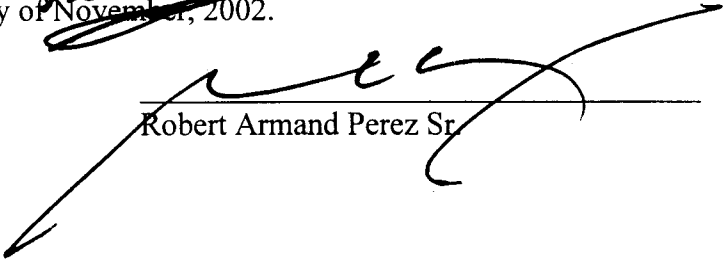
Respectfully submitted,



Robert Armand Perez Sr.
THE PEREZ LAW FIRM CO., L.P.A.
7672 Montgomery Road, #378
Cincinnati, OH 45236-4204
(513) 891-8777 - telephone
(513) 891-0317 - telefax

CERTIFICATE OF SERVICE

I hereby certify that a copy of this has been mailed by ordinary mail, postage-paid to the attorney for the Defendant on this 25th day of December, 2002.


Robert Armand Perez Sr.